

EXHIBIT 3

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: INSULIN PRICING
LITIGATION**

**Case No. 2:23-md-3080 (BRM)(LDW)
MDL No. 3080**

**JUDGE BRIAN R. MARTINOTTI
JUDGE LEDA D. WETTRE**

**DECLARATION OF SOPHIA A.
HANSELL IN SUPPORT OF
MOTION TO SEAL**

THIS DOCUMENT RELATES TO ALL CASES

I, **SOPHIA A. HANSELL**, declare as follows:

1. I am over 21 years of age, am of sound mind and body, and am otherwise competent to testify. I have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would testify to them.

2. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP. I represent OptumRx, Inc., OptumRx Holdings, LLC, and Emisar Pharma Services, LLC (“OptumRx”) in the FTC administrative action bearing Docket No. 9437 (the “FTC Action”).

3. As part of my law firm’s representation of OptumRx in the FTC Action, we, along with counsel for the other PBM Defendants, engaged Compass Lexecon (“Compass”) to provide potential expert services as of May 18, 2023. I am familiar with the retention agreement between counsel for the PBM Defendants and Compass, attached hereto as Exhibit 2.

4. I make this declaration in support of the PBM Defendants filing Exhibit 2 under seal, and redacting certain quotations from Exhibit 2 in the Opposition [ECF No. 596].

5. Both Exhibit 2, and redacted quotations from Exhibit 2 in the Opposition, should remain under seal. Exhibit 2 contains detailed contractual terms, carefully negotiated between counsel for the PBM Defendants and Compass. Those terms include methods of termination, limitations of liability, dispute resolution, and

compensation. They are the results of careful negotiation between counsel for the PBM Defendants and Compass, and do not reflect terms that other experts may be entitled to in other matters. Public disclosure of these terms would harm the PBM Defendants' ability to negotiate similar terms for similar engagements.

I declare, under penalty of perjury that the foregoing is true and correct.

Executed: June 18, 2025 in Washington, DC.

A handwritten signature in dark ink, appearing to read "Sophia A. Hansell", written in a cursive style.

SOPHIA A. HANSELL